

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

In re: Clearview AI, Inc. Consumer Privacy  
Litigation

Civil Action File No.: 1:21-cv-00135

Judge Sharon Johnson Coleman

Magistrate Judge Maria Valdez

**PLAINTIFFS' MOTION FOR LEAVE TO FILE REPLY IN SUPPORT OF MOTION  
FOR PRELIMINARY INJUNCTION UNDER SEAL**

Pursuant to Local Rules 5.8 and 26.2, Plaintiffs, by and through Plaintiffs' interim lead class counsel, respectfully move the Court for an Order granting them leave to file the full version of their forthcoming motion to compel under seal. In support of this motion, Plaintiffs state as follows:

1. The Court ordered Plaintiffs to file their reply in support of their motion for preliminary injunction on or before May 17, 2021. Dkt. 51 at 8. Plaintiffs intend to file their reply brief later today – May 17, 2021.

2. The Court has entered an Agreed Confidentiality Order (Dkt. 62). The Agreed Confidentiality Order allows the parties to designate documents containing confidential information as "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL" and limits the parties' use of such information. *Id.* ¶¶ 2-7.

3. Additionally, the Agreed Confidentiality Order states that a party seeking to file a document containing information designated as "Confidential" or "Highly Confidential" must comply with Local Rule 26.2. *Id.* ¶ 9.

4. The reply brief contains information and exhibits designated by the Clearview Defendants as “Confidential” and “Highly Confidential” pursuant to the Agreed Confidentiality Order.

5. In order to preserve the confidential nature of the information and documents at issue, Plaintiffs seek to file the full version of their reply in support of their motion for preliminary injunction under seal. At the same time, Plaintiffs will publicly file a redacted version of the reply brief which also will include all of the exhibits that are not confidential.

WHEREFORE, Plaintiffs respectfully move the Court for leave to file their reply in support of their motion for preliminary injunction under seal.

Dated: May 17, 2021

Respectfully submitted,

By: /s/ Scott R. Drury  
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*Interim Lead Class Counsel for Plaintiffs*

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**CERTIFICATE OF SERVICE**

I, Scott R. Drury, an attorney, hereby certify that, on May 17, 2021, I filed the foregoing document using the Court's CM/ECF system, which effected service on all counsel of record.

/s/ Scott R. Drury  
*Interim Lead Class Counsel for Plaintiffs*